

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

KATHLEEN PROKESCH d/b/a METROPOLITAN EVENTS

Plaintiff,

- against -

DENISE RESTAURI and GURL2GURL

PRODUCTIONS, INC.

Defendant.

10 cv 722

AKH

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Stephen Kline, Esquire a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Vincent J. Restauri, Jr.
Firm Name: Vincent Restauri Law Offices
Address: 85 Firethorn Road
City/State/Zip: Baden, Pennsylvania 15005
Phone Number: 412.427.5914
Fax Number: 412.291.1123

Vincent J. Restauri, Jr. is a member in good standing of the Bar of the States of Pennsylvania

There are no pending disciplinary proceeding against in any State or Federal court.

Dated: February 25, 2010

City, State: New York, NY

Respectfully submitted,

Stephen Kline

Sponsor's

SDNY Bar Stephen Kline, Esq. SK3395

Firm Name: Stephen Kline, Esq., P.C.

Address: 7618 6th Avenue

City/State/Zip: Brooklyn, NY 11209

Phone Number: 917.723.5044

Fax Number: 917.591.5652

SAMMY SPYRIDOULIAS
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN NEW YORK COUNTY
NO. 01SP6188798
MY COMMISSION EXPIRES 06-16-2012

[Signature]

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Plaintiff,
Kathleen Prokesch d/b/a Metropolitan Events

-v-

Denise Restauri and Gurl2Gurl Productions, Inc.
Defendant.

Case No. 10 CV 722

**AFFIDAVIT OF STEPHEN KLINE, ESQUIRE
IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

Stephen Kline , being duly sworn, hereby deposes and says as follows:

I am counsel for Defendants in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Vincent J. Restauri, Jr. as counsel pro hac vice to represent Defendants in this matter.

I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1997. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

Denise Restauri, the Defendant, was a client of a company for whom I served as Counsel, and I have known her for more than a year. Vincent J. Restauri, Jr. is Denise's brother and I was introduced to him recently in response to this litigation. I have spoken with Vincent Restauri, about this litigation matter and his lengthy career and I have satisfied myself that:

He is a graduate of Yale University (1971), and Duquesne University Law School in Pittsburgh, Pennsylvania (1977). Upon graduation from law school, he served as judicial law clerk to the Honorable Herbert P. Sorg, Chief Judge, United States District Court for the Western District of Pennsylvania.. Mr. Restauri was admitted to the Bar of the Supreme Court of Pennsylvania in 1977 and to the Bar of the United States District Court for the Western District of Pennsylvania in 1978. In the mid-1980's he served as primary counsel to the two Standing Chapter 13 Trustees in the United States Bankruptcy Court for the Western District of Pennsylvania and appeared weekly in the Court to present and argue motions. He has practiced law full-time, exclusively, and continuously, for over thirty years, mostly as a sole practitioner, in both State and Federal

courts. He has never been the subject of any disciplinary proceeding by any court or board. He has served as lead trial counsel in a wide-variety of cases in the State and Federal courts. Lanham Act questions are the basis for Federal jurisdiction in the Complaint filed in this case, and Mr. Restauri has served as lead trial counsel in several Lanham Act cases within the last five years. In one of them, he appeared, *pro hac vice*, in the United States District Court for the District of New Jersey. Mr. Restauri has also appeared as lead trial counsel, *pro hac vice*, in the United States District Court for the District of Colorado. Mr. Restauri has never been an employee, officer, director, or shareholder in Defendant Gur2Gurl Productions, Inc. His involvement in Gur2Gurl has been limited to advising the corporation on legal matters.

I have found Mr. Restauri to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

Accordingly, I am pleased to move the admission of Vincent J. Restauri, Jr., *pro hac vice*.

I respectfully submit a proposed order granting the admission of Vincent J. Restauri, Jr. *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Vincent J. Restauri, Jr., *pro hac vice*, to represent Defendants in the above captioned matter, be granted.

Dated: 2/25/2010

City, State: Notarized:

Respectfully submitted,



Stephen Kline
SK3395
Stephen Kline, Esq., P.C.
7618 6th Avenue
Brooklyn, NY 11209
917.723.5044 P
917.591.5652 F

SAMMY SPYRIDOULIAS
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN NEW YORK COUNTY
NO. 01SP6188798
MY COMMISSION EXPIRES 06-16-2012





Supreme Court of Pennsylvania

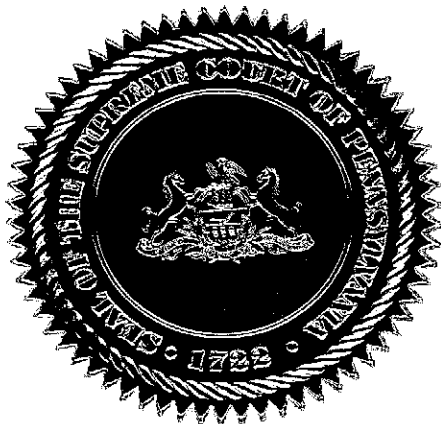
CERTIFICATE OF GOOD STANDING

Vincent James Restauri, Jr., Esq.

DATE OF ADMISSION

October 18, 1977

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: February 23, 2010

A handwritten signature in cursive script, reading "Patricia A. Nicola".

**Patricia A. Nicola
Chief Clerk**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KATHLEEN PROKESCH d/b/a
METROPOLITAN EVENTS Plaintiff,

10 cv 722 ()

- against -

DENISE RESTAURI and GURL2GURL
PRODUCTIONS, INC.

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

Upon the motion of STEPHEN KLINE attorney for DENISE RESTAURI and GURL2GURL
and said sponsor attorney's affidavit in support; PRODUCTIONS, INC., DEFENDANTS

IT IS HEREBY ORDERED that

Applicant's Name: Vincent J. Restauri, Jr.
Firm Name: Vincent Restauri Law Offices
Address: 85 Firethorn Road
City/State/Zip: Baden, Pennsylvania 15005
Telephone/Fax: T: 412.427.5914/ F: 412.291.1123
Email Address: vince.restauri @ gmail.com

is admitted to practice pro hac vice as counsel for DENISE RESTAURI & GURL2GURL PROD. INC. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State: New York, NY

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#

SDNY Form Web 10/2006

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Plaintiff,
Kathleen Prokesch d/b/a Metropolitan Events

-v-

Denise Restauri and Gurl2Gurl Productions, Inc.
Defendant.

Case No. 10 CV 722

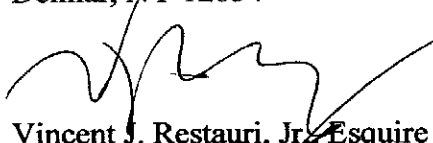
PROOF OF SERVICE

I, Vincent J. Restauri, Jr., hereby certify that on February 25, 2010 I served true and correct copies of the foregoing documents:

Motion of Stephen Kline, Esquire to Admit Vincent J. Restauri, Jr., Pro Hac Vice,
Affidavit of Stephen Kline, Esquire, in support of said Motion,
Certificate of Good Standing from the Supreme Court of Pennsylvania, and
Proposed Order of Court granting said Motion, as follows:

BY EMAIL and BY FIRST-CLASS US MAIL, postage-prepaid, addressed as follows:

Jeremiah F. Manning, Esquire
Manning, Esq. Law Offices
49 Oldox Road
Delmar, NY 12054



Vincent J. Restauri, Jr., Esquire
85 Firethorn Road
Baden, PA 15005
T: 412.427.5914
F: 412.291.1123
vince.restauri@gmail.com
February 25, 2010